



Via Electronic Filing

February 13, 2023

The Honorable Judge Ingram-Luna v. All Call LLC et al
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re.: Ingram-Luna v. All Call LLC et al (2:23-cv-00228)

Defendants, All Call LLC and Kristina Edwards Haydel (“Defendants”), in the above-referenced matter. Defendants were served on January 22, 2023. Based on that service, the current deadline for Defendants to respond to the Complaint is February 13, 2023.

undersigned counsel, files this letter motion on behalf of Defendants, with Plaintiff’s consent, respectfully request the extension of time for Defendants to answer, move, or otherwise respond to the Complaint to March 16, 2023. request the extension of time to respond to the Complaint as Defendants recently retained undersigned counsel and ss of intaking and reviewing Defendants’ files relevant to the underlying litigation.

s Defendants’ first request for an extension of time to respond to the Complaint.

iff does not oppose an extension of Defendants’ time to respond to the Complaint so that Defendants may respond to the Complaint and the parties may explore potentially resolving this matter. We thank the Court for its his matter.

Respectfully,



Ian E. Smith, Esq.
Partner, Spire Law, LLC